

Commissioners,

My name is Tim Gorman. I am an Extra Class licensee in the Amateur Radio Service, callsign AB0WR.

This proposal, in essence, combines the Novice, Technician, and Technician Plus license classes into one class with the privileges now only given to the Novice and Technician Plus license classes. While not specifically stating so, it is assumed that the Element 1 requirement would be retained for the currently available General and Extra license classes.

This would definitely open up significant new bandwidth to licenses that have not demonstrated any communication skills under Title 47, Part 97.1(c). It would provide access to the resources needed for any and all modes and types of communication on almost all amateur bands available today. It would allow development in the communication phase of the Amateur Radio Service using on-air practice. It would still retain an incentive for the base license classe to upgrade to obtain access to even more bandwidth by demonstrating advancing skill in the art of communication as covered in Title 47, Part 97.1(c).

Advancing this proposal would allow the FCC to meet its requirements under Title 47, Part 97.1(c) to encourage and improve the amateur service through rules which provide for advancing skills in the communication phase of the art.

While the Morse code may be an "old" skill, that does not make it any less useful on the amateur bands. It is an easily learned skill at 5 wpm and it is easily adapted to testing almost anyone with any conceivable disability. Even a deaf, blind, quadraplegic can be tested using a simple vibrating piezo-electric element and an assistant to mark the test sheet.

None of the other proposals made from RM-10781 through RM-10787 offer any easily implemented method for the FCC to meet its requirements under Title 47, Part 97.1(c). None of the other comments offer any substitute for the Morse testing that is as simple, as easily implemented, and which is as non-discriminatory as the Morse code testing.

There is also an obligation under the Communications Act of 1934, Section 606 (as amended) and under Executive Order 12472, Assignment of National Security and Emergency Preparedness Telecommunications Functions for the FCC to insure that there is a pool of operators available to the RACES able to use all assigned frequencies and modes available to RACES to implement emergency government communications in the case of the War Emergency powers being enacted. Since the primary capability available to the RACES in the HF CW subbands is Morse code using CW (RTTY, psk31, and other digital modes used on the HF bands are not available to most government agencies or Emergency Operation Centers), it is incumbent on the FCC to at least make an effort that a pool of operators capable of communicating on those subbands are developed.

This proposal would provide for minimal entry barriers to the Amateur Radio Service, would meet the FCC requirements to provide for advancing skills in the communication phase of the art, and would insure a continuing pool of operators capable of all modes and types of communication for RACES.

I humbly recommend the FCC give this proposal detailed consideration.

Respectfully yours,

Tim Gorman AB0WR